

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

APRIL DARRIN, *et al.*, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

HUNTINGTON INGALLS INDUSTRIES,
Defendant.

Case. No. 4:23-cv-00053-JKW-DEM

CLASS ACTION

PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Pursuant to Federal Rules of Civil Procedure Rule 23, Plaintiffs, individually and on behalf of the Settlement Class, respectfully move the Court for Final Approval of the Class Action Settlement. Plaintiffs also move for an award of Attorneys' Fees and costs as well as Service Awards for the Representative Plaintiffs for the reasons outlined in the concurrently filed Memorandum of Law and in Plaintiffs' previously filed Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Service Awards to Plaintiffs. ECF 51.

Dated: August 22, 2024

Respectfully submitted,

/s/ David Hilton Wise

David Hilton Wise (VA Bar No. 30828)

William N. Evans (VA Bar No. 87506)

WISE LAW FIRM PLC

10640 Page Avenue, Suite 320

Fairfax, Virginia 22030

Phone: 703-934-6377

dwise@wiselaw.pro

wevans@wiselaw.pro

Scott Edward Cole
(admitted *Pro Hac Vice*)
COLE & VAN NOTE
555 12th Street, Suite 2100
Oakland, CA 94607
Telephone: (510) 891-9800
Email: sec@colevannote.com

Gary E. Mason
(admitted *Pro Hac Vice*)
MASON LLP
5335 Wisconsin Avenue NW, Suite 640
Washington, DC 20015
Telephone: (202) 429-2290
Email: gmason@masonllp.com

Raina Borrelli
(admitted *Pro Hac Vice*)
TURKE & STRAUSS LLP
613 Williamson Street, Suite 201
Madison, Wisconsin 53703
Telephone: (608) 237-1775
Email: raina@turkestrauss.com

Kenneth J. Grunfeld
GOLOMB SPIRT GRUNFELD P.C.
1835 Market Street, Suite 2900
Philadelphia, Pennsylvania 19103
Telephone: (215) 346-7338
Email: KGrunfeld@GolombLegal.com

Steven T. Webster, VA Bar No. 31975
WEBSTER BOOK LLP
300 N. Washington Street, Suite 404 Alexandria,
Virginia 22314
Telephone: (888) 987-9991
Email: swebster@websterbook.com

Counsel for Plaintiffs and the Settlement Class

CERTIFICATE OF SERCIVE

I, David Hilton Wise, hereby certify that on August 22, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record via the ECF system.

DATED this 22nd day of August, 2024

WISE LAW FIRM PLC

By: /s/ David Hilton Wise
David Hilton Wise, VA Bar No. 30828
WISE LAW FIRM PLC
10640 Page Avenue, Suite 320
Fairfax, Virginia 22030
Telephone: 703-934-6377
dwise@wiselaw.pro